Pennsylvania Department of Environmental Protection
Southeast Regional Office
Waste Management/Environmental Cleanup Programs

2 East Main Street
Norristown, PA 19401

Date: 8/4/04

Time: 1000

Number of pages including cover sheet: 4

To:
GRANT DUFFICY
EPA
PHILADELPHIA, PA

Phone:

Fax phone: 215-814-3113

CC:

From:

Pennsylvania
Department of Environmental Protection
www.dep.state.pa.us

Thomas Buterbaugh
Geologic Specialist
ECP - Special Projects Section

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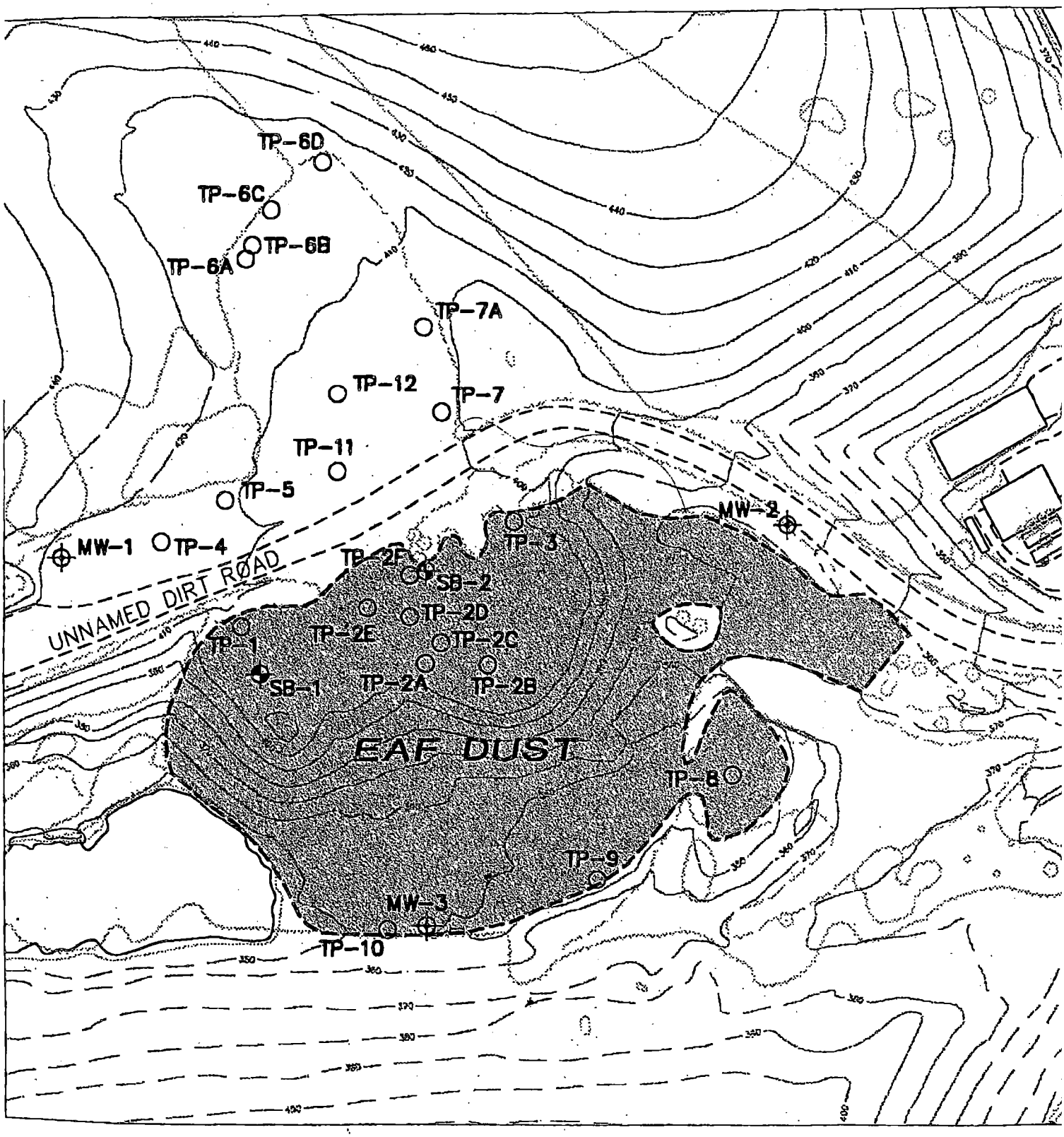
REMARKS: ☐ Urgent ☑ For your review ☐ Reply ASAP ☐ Please comment

GRANT -

ATTACHED ARE SOME DOCUMENTS I HAD IN MY POSESSION FOR THE EAF MONOFILL SITE. I RECOMMEND LOOKING @ OUR REGIONAL FILE & CONTACTING MISS MYERS W/ CCEDE

THANK.

PLEASE CALL IF YOU ENCOUNTER PROBLEMS WITH THIS FAX


TP-6D
TP-6C
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TP-12
TP-7
TP-11
TP-5
MW-1
TP-4
UNNAMED DIRT ROAD
TP-2F
SB-2
TP-3
MW-2
TP-1
TP-2E
TP-2D
TP-2C
SB-1
TP-2A
TP-2B
EAF DUST
TP-8
TP-9
MW-3
TP-10

Chester County Brownfields Program
CONFERENCE CALL MINUTES
January 14, 2004

I. Attendance (Detailed contact info is provided in a separate Excel Spreadsheet)

Missy Myers (CCEDC)
Matt Hickey (CCEDC)
Kate Baganski (CCEDC)
Art Bernardon (Bernardon Haber Holloway Architects, P.C.)
Gerry Hanby (Bernardon Haber Holloway Architects, P.C.)
Chris Reitz (Bernardon Haber Holloway Architects, P.C.)
Tom Buterbaugh (PA DEP)
Alex Reyda (PA DEP)

II. Background on Electric Arc Furnace Dust Monofill Site

- The subject area comprises about 3.5 acres where EAF dust was historically placed on the approximately 25 acre parcel located west of the intersection of South First Avenue and Newlinville Road in the Borough of South Coatesville, Chester County, Pennsylvania.
- The subject area is property previously owned by Bethlehem Steel. In 2003, Bethlehem Steel declared bankruptcy and International Steel Group (ISG) became the owner of the parcel in question. ISG inherited all rights and responsibilities associated with the parcel.
- Art mentioned that ISG is interested in presenting this land to Chester County as a gift with the guarantee that ISG will be indemnified.
- Chester County would like to utilize the land for Public Services/Safety Training (police, emergency, 911, HAZMAT, etc.)
- According to Alex, in 1998 the DEP approved the Work Plan from Golder Associates to characterize the monofill area. In 2000, the DEP approved a remediation plan for this area submitted by Bethlehem Steel; however, the final closure has yet to be implemented. There was a deed acknowledgement and the cleanup plans were all fine by DEP. In September 2002, Bethlehem Steel was to move forward with the remediation. There were many parties involved with this site (i.e., Army Corps, DEP Water Quality, HSCA, EPA). In February 2003, the technical specifications for the remedial work were submitted to the DEP by Golder Associates on behalf of Bethlehem Steel. At this point (January 2004) remediation has not begun.
- Alex reiterated that the approved remediation plans described capping the monofill area and containing the area within a fence; however, there was the assumption that the area would not be utilized. If the

county would like to actively use the monofill area then the remediation plans may have to be reevaluated.

- Regarding the transfer of the property from ISG to Chester County: State and Federal monies may not be available to the county for the monofill site if ISG merely transfers the land without remediating first because ISG is currently the "responsible party". (Alex concurred that the county may not want the liability). If needed, Ms. Louise Thompson is the Act 2 Legal Counsel for the DEP.

  If the entire 25 acre parcel is to be sold/transferred then a Phase I and Phase II would be required on all 25 acres and not just the monofill area. (There currently is an issue with ISG in that ISG is not permitting any other entity to perform Phase I or Phase IIs. Instead, ISG wants to pay for any Phase I or Phase IIs and then upon transferring the property ISG would be reimbursed by the new owner).

III. Action Items

- Confirm all the details about the monofill area and the parcel where it is situated (*i.e.*, tax parcel number, township, size, etc.) (Bernardon)
- Go out to the site and observe where the monofill area is in relation to the rest of the parcel to help determine whether or not the monofill area can or should be kept separate from the rest of the area in future transfer/sale/uses. (Bernardon)
- Review DEP files for previous Phase I and Phase II reports on this parcel. (DEP/CCEDC) ***There will be a delay in this action until late February or early March due to the DEP move.***
- Determine who would own the property if the site is transferred. (Bernardon/CCEDC) ***There currently is some disagreement within the county about this. This matter may be solved once it is determined what liabilities are involved.***
- Contact Golder Associates to gather a ballpark estimate on the cost for the remediation work. (Bernardon) ***It is not known whether or not Golder will be cooperative. This may depend on whether or not they were paid for their previous work.***

LUKENS STEEL

ID THE SITE WAS REFERRED TO EPA REMOVAL BRANCH BY EPA PRE-REMEDIAL SITE INSPECTIONS, IN ORDER FOR EPA TO CONDUCT A REMOVAL ASSESSMENT. THE GENERAL OBJECTIVES OF THE REMOVAL ASSESSMENT ARE TO EVALUATE THE NATURE, EXTENT AND DEGREE OF CONTAMINATION AT OR BORDERING THE SITE. THE SITE IS AN INACTIVE DISPOSAL PIT THAT CONTAINS APPROX. 135,000 TONS OF ELECTRIC ARC FURNACE DUST WHICH WAS DUMPED BY LUKENS STEEL INTO THE PIT FROM 1962 - 1980. PRIOR TO THE PIT BEING USED FOR THE DUMPING OF THE FURNACE DUST IT WAS USED, BY LUKENS STEEL AS A DISPOSAL AREA FOR BLAST FURNACE SLAG WASTES.

MA FURNACE DUST, LEAD, ARSENIC, CHROMIUM

TH THREAT TO SOIL, SURFACE WATER, AND GROUNDWATER

AT A WINDSHIELD ASSESSMENT WAS PERFORMED. EVIDENCE OF ROAD EROSION ON THE NORTH SIDE OF THE PIT WAS OBSERVED, AND NO SOIL EROSION CONTROLS WERE OBSERVED AROUND THE PIT. RETURN TO THE SITE TO OBTAIN APPROPRIATE SURFACE WATER, SEDIMENT, AND GROUNDWATER SAMPLES. OSC TO CONTACT PROPERTY OWNER TO GAIN ACCESS TO THE SITE. FURTHER DETERMINATIONS TO BE MADE AFTER SAMPLING PHASE OF THE REMOVAL ASSESSMENT. BASED ON OFFSITE SAMPLING, THERE DOES NOT APPEAR TO BE SIGNIFICANT MIGRATION OF CONTAMINANTS FROM THE SITE. NO EXCEEDANCES OF MCLS WERE OBSERVED IN GROUNDWATER OR SURFACE WATER SAMPLES TAKEN ON AND OFF-SITE. BASED UPON AVAILABLE INFORMATION, IT APPEARS THAT WASTE IN THE DISPOSAL AREA WAS DISPOSED PRIOR TO 1980. OFF SITE RESIDENTIAL WELL SAMPLES WERE ANALYZED FOR BNAS AND TAL METALS. THE ANALYTICAL RESULTS INDICATE THAT THE GROUNDWATER IS NOT CURRENTLY IMPACTED BY ANY CONTAMINANTS FROM THE SITE. OFF-SITE SOIL SAMPLES FOR LEAD RANGED FROM 196 PPM TO 232 PPM. HOWEVER, A SEDIMENT SAMPLE 20 FT FROM BRANDYWINE CREEK EXHIBITED CONCENTRATIONS OF ARSENIC AT 13.1 PPM, AND A WATER SAMPLE AT 3 PPB. ADDITIONALLY, CHROMIUM IS PRESENT IN A WATER SAMPLE AT 1,000 PPB. THE NATURE AND EXTENT OF CONTAMINATION MIGRATING FROM THE DISPOSAL AREA PRESENTLY DOES NOT WARRANT EMERGENCY RESPONSE OR REMOVAL ACTIONS AT THIS TIME.

POLREP # 1
LUKENS STEEL SITE ASSESSMENT
NEWVILLE ROAD AND SOUTH 1ST AVENUE
SOUTH COATESVILLE, PA, 19320
ATTN: CHARLIE KLEEMAN AND JOHN RILEY

I. SITUATION: (1630 HOURS, FRIDAY FEBRUARY 9, 1996)
EVENTS: WINDSHIELD SITE ASSESSMENT

A. THE SITE WAS REFERRED TO EPA REMOVAL BRANCH BY EPA PRE-REMEDIAL SITE INSPECTIONS, IN ORDER FOR EPA TO CONDUCT A REMOVAL ASSESSMENT.
B. THE GENERAL OBJECTIVES OF THE REMOVAL ASSESSMENT ARE TO EVALUATE THE NATURE, EXTENT AND DEGREE OF CONTAMINATION AT OR BORDERING THE SITE.
C. WEATHER: WARM AND CLEAR; TEMP'S IN THE 50'S.
D. THE SITE IS LOCATED ON LUKENS STEEL PROPERTY, NEAR THE INTERSECTION OF NEWVILLE ROAD AND SOUTH 1ST AVENUE IN THE BOROUGH OF SOUTH COATESVILLE, PA.
E. THE SITE IS AN INACTIVE DISPOSAL PIT THAT CONTAINS APPROX. 135,000 TONS OF ELECTRIC ARC FURNACE DUST WHICH WAS DUMPED BY LUKENS STEEL INTO THE PIT FROM 1962 TO 1980. PRIOR TO THE PIT BEING USED FOR THE DUMPING OF THE FURNACE DUST IT WAS USED, BY LUKENS STEEL AS A DISPOSAL AREA FOR BLAST FURNACE SLAG WASTES.

II. ACTIONS TAKEN:
A. OSC OWENS, SAM GIURANNA, ATSDR WALTERS AND SATA PERFORMED A WINDSHIELD ASSESSMENT TO BEGIN PLANNING FOR A REMOVAL ASSESSMENT TO DETERMINE IF A THREAT EXISTS TO THE ENVIRONMENT AND NEARBY RESIDENTS FROM THE SITE.
B. EVIDENCE OF ROAD EROSION ON THE NORTH SIDE OF THE PIT WAS OBSERVED, AND NO SOIL EROSION CONTROLS WERE OBSERVED AROUND THE PIT.
C. AS PART OF THIS INVESTIGATION, THE OSC SECURED ACCESS FROM THREE LOCAL RESIDENCES WITH HOME WATER-WELLS, FOR EPA TO COLLECT WATER SAMPLES AT A LATER DATE.

III. FUTURE ACTIONS:
A. RETURN TO THE SITE TO OBTAIN APPROPRIATE SURFACE WATER, SEDIMENT, AND GROUNDWATER SAMPLES.
B. OSC TO CONTACT PROPERTY OWNER TO GAIN ACCESS TO THE SITE.
C. FURTHER DETERMINATIONS TO BE MADE AFTER SAMPLING PHASE OF THE REMOVAL ASSESSMENT.

JACK OWENS, OSC
EPA REGION III
PHILADELPHIA, PA

POLREP # 2 & FINAL
LUKENS STEEL Removal/Site Assessment
COATESVILLE, BUCKS COUNTY, PENNSYLVANIA # 19320

ATTN: Charles Kleeman, Bill Riley, Mike Giuranna

SUMMARY:

A joint Removal/Site Assessment of the inactive Lukens Steel Electric Arc Furnace Dust Pit Disposal Area or Site was performed on March 21, 1996. The purpose of the assessment was to evaluate the potential for those hazardous substances (K061) posing a potential for offsite migration. No past or current enforcement action pursuant to RCRA against Lukens Steel are recorded. This 185 year old steel making facility is located in a heavily industrialized area, and is basically in a valley. The inactive disposal area was used for disposal of RCRA-classified hazardous waste K061 (electric arc furnace dust) from 1962 to 1980. The disposal pit area was formerly used for disposal of blast furnace slag from 1810 to 1955, and the slag was later used as ballast for road construction. The slag mining operation created a four-acre pit at the end of the valley. Since 1980 all newly generated electric arc furnace dust has been transported to a metals recovery firm for recycling. No remedial action has been performed at the inactive disposal site, and it remains uncovered and sparsely vegetated.

The area East and South of the site is primarily residential with approximately 20 homes within a 1/4 mile radius, while North and West of the site remains largely undeveloped. A dirt/macadam road allowed trucks access to the edge of the disposal pit, and waste was allowed to flow to the bottom.

Currently site access is restricted by a steel cable/gate across the access road. The site has been owned by Lukens Steel since 1810, and contains approximately 135,000 tons of K061 hazardous waste.

Ground breaking ceremonies were held in South Coatesville on July 25, 1957 for an all new steel making facility centering about a 100-ton electric furnace ("A"). The decision to build an electric melt shop was a striking break with the past. It was a step which began the abandonment of the company's open hearth furnaces, which, despite modernization attempts, were becoming cost problems and environmental liabilities. Electric arc furnaces can make steel more efficiently, allow more sophisticated control of operations, and enhance the versatility needed in specialty steel production.

A second 100-ton electric arc furnace ("B") was built in 1962, followed by a third furnace ("C") of 150-ton capacity in 1964. A forth ("D") and final 150-ton electric arc furnace was installed in 1972, and this phased out the last of the open hearth production furnaces.

In 1985 the "D" furnace was rebuilt, increasing the furnace's productivity by 30 percent, and this presently supplies practically all of Lukens current steel making needs. The "C" furnace is kept in an emergency stand-by mode, while the earlier "A" and "B" furnaces have been dismantled.

I. Situation (Thursday, 5-30-96)

A. On March 21, 1996 SATA collected and split samples of onsite water, soil, and sediment with Spotts, Stevens, and McCoy (SSM) Lukens Steel environmental contractor. Sampling was designed to provide EPA with data necessary to determine the actual or potential effects the electric arc dust disposal area may have on the surrounding soils, drinking water, surface water, or if off-site migration of contaminants from the disposal area has occurred.

B. The principal contaminants of concern at the Lukens disposal pit are lead, cadmium, and arsenic which is contained in large quantities from the smelting waste from past disposal actions.

C. The results of the surface water, sediment, and soil samples were compared to current EPA Region III Emergency Removal Guidance Criteria (EPA,1993), National Primary Drinking Water Standards, Maximum Contaminant Levels (MCL) for drinking water, and Clean Water Act.

D. Overall, the results of the on-site samples exhibited higher concentrations of metals than the off-site samples. Lead in on-site soil ranged from 394 ppm to 704ppm; sediment 337ppm. A ponded water sample from the base of the disposal pile had a lead concentration of 3.2 ppb. The Clean Water Act exposure water quality criteria for protection of aquatic life is 3.2 ppb. With the exception of the sample obtained from the actual disposal pile, all on-site and off-site metal concentrations are below the current Region III Emergency Removal Guidance Levels.

E. The exposure pathways likely to be of concern are direct contact, ingestion, and inhalation for both human and animal receptors.

II. Actions Taken:

A. Based upon off-site sampling, there does not appear to be significant migration of contaminants from the site.

B. No exceedances of MCLs were observed in groundwater or surface water samples taken on and off-site.

C. Based upon available information, it appears that waste in the disposal area was disposed prior to 1980. The facility is a "generator" of hazardous waste according to

facility personnel. Based upon limited available information, it does not appear that the facility is a TSD. It is not clear whether the facility has submitted either a part A or notification under RCRA. EPA may have statutory authority pursuant to RCRA to require Lukens Steel, the owner/operator, to remediate the disposed hazardous waste.

D. Off-site residential well samples were analyzed for BNAs and TAL metals. The analytical results indicate that the groundwater is not currently impacted by any contaminants from the site. Local residential potable water supply is both public water and private well supply.
Off-site soil samples for lead ranged from 196 ppm to 232 ppm. However, a sediment sample 20 feet from Brandywine Creek exhibited concentrations of arsenic at 13.1 ppm; and a water sample at 3 ppb. Additionally, chromium is present in a water sample at 1,000 ppb.

E. The potential for contaminant migration from the 135,000 ton waste pile (Lead-12,000 ppm) to surface soils, ground/surface water, and fugitive emissions from waste and contaminated soils is present, the OSC is referring the site to Mr. Mike Giuranna, EPA Site Assessment Section for further investigation. The OSC will task SATA to transmit all analytical data to Site Assessment Section.

III. Future:

A. The nature and extent of contamination migrating from the disposal area presently does not warrant emergency response or removal actions at this time.
No significant off-site contamination has been identified. The OSC has determined that no further emergency Removal action is necessary or warranted at this time.

B. Site Assessment Section (Guiranna) to further investigate, including further sampling, and the need for engineering controls to prevent hazardous substances in waste from the disposal area from migrating offsite to nearby residences or entering into Brandywine Creek.

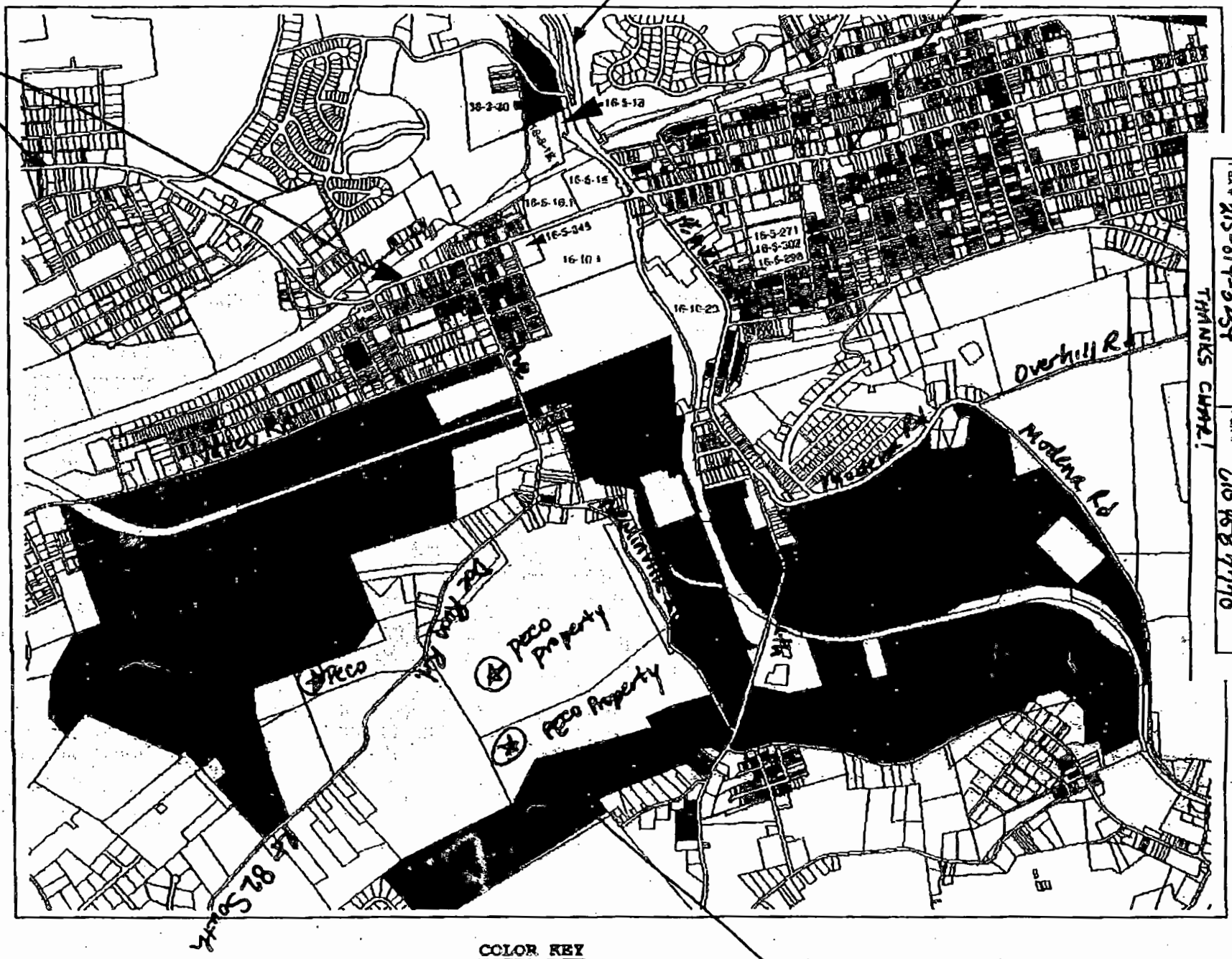
C. Further determinations need to be made as to appropriate corrective measures which will either:

1. Ensure that there is no future migration of hazardous substances from the disposal area.

2. Remediate the hazardous substances found in the disposal area.

_____
Jack Owens, OSC
US EPA Region III
Philadelphia, PA

ISG Photo



COLOR KEY

Brown= Township of Valley
Red= Township of East Fallowfield
Blue= Borough of South Coatesville

ISG property w/ EAF-Monofill Issue

(A) Areas of Interest for R

Charlene Kratmer
Co./Dept. EPA
Phone # -2145
Fax # 215-814-3254

Co. CCEDC
Phone # 610-458-5700 x230
Fax # 610 458 7770

THANKS CHARLENE!

TOTAL P.01